

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

'07 MJ 88 26

UNITED STATES OF AMERICA,

Plaintiff,

v.

Ricardo RUIZ

Defendant.

Magistrate Case No.:

COMPLAINT FOR VIOLATION OF

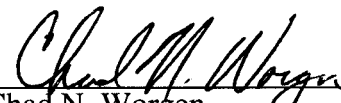
21 U.S.C. § 952 and 960

Importation of a Controlled Substance  
(Felony)

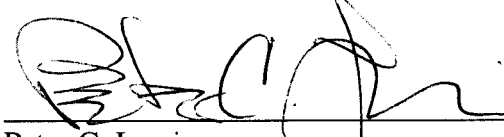
The undersigned complainant being duly sworn states:

On or about October 1, 2007, within the Southern District of California, defendant Ricardo RUIZ did knowingly and intentionally import approximately 24.00 kilograms (52.80 pounds) of cocaine, a Schedule II Controlled Substance, into the United States from a place outside thereof, in violation of Title 21, United States Code, Sections 952 and 960.

The complainant states that this complaint is based on the attached Statement of Facts incorporated herein by reference.

  
Chad N. Worgen  
U.S. Immigration & Customs  
Enforcement

SWORN TO, BEFORE ME, AND SUBSCRIBED IN MY PRESENCE THIS 2<sup>nd</sup> DAY  
OF OCTOBER 2007.

  
Peter C. Lewis  
U.S. MAGISTRATE JUDGE

1 UNITED STATES OF AMERICA

2 v.

3 Ricardo RUIZ

4 STATEMENT OF FACTS

5 This complaint is based upon the personal observations, investigation and information  
6 provided to U.S. Immigration and Customs Enforcement Special Agent Chad N. Worgen.

7  
8 On October 1, 2007, Ricardo RUIZ entered the United States at the Calexico, CA, West  
9 Port of Entry. RUIZ was the driver and registered owner of a 2006 Nissan Frontier. Customs  
10 and Border Protection Officer (CBPO) Sabori, E. received a negative Customs declaration.  
11 CBPO Sabori tapped the spare tire and it felt solid. CBPO Sabori escorted both RUIZ and his  
12 vehicle into the secondary lot for a more intensive inspection.

13  
14 In vehicle secondary, CBPO Garcia, E. received a negative oral Custom declaration.  
15 CBPO Garcia requested Canine Enforcement Officer (CEO) Caldera, K. to screen the vehicle  
16 with his canine. CEO Caldera informed CBPO Garcia that his canine alerted to the vehicle. After  
17 further inspection of the vehicle, CBPO Garcia discovered a total of 21 packages within the spare  
18 tire. CBPO Garcia probed a package producing a white powdery substance that tested positive for  
19 cocaine. The total weight of the packages was 24.00 kilograms (52.80 pounds).

20  
21  
22 RUIZ was arrested for violation of Title 21 United States Code 952 and 960, Importation  
23 of a Controlled Substance. Special Agent (SA) Worgen read RUIZ his constitutional rights per  
24 Miranda. RUIZ waived his rights, agreeing to make a statement.

25  
26 RUIZ admitted knowledge of controlled substances within the vehicle. RUIZ stated that  
27 he was to be paid \$500.00 to cross the vehicle from the United States from Mexico.

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29